

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (RCC) ECF Case
---	-------------------------------

This document relates to:

Kathleen Ashton, et al. v. Al Qaeda Islamic Army, et al.
(02 CV 6977) ("Ashton")

Thomas E. Burnett, et al. v. Al Baraka Inv. & Dev.
Corp., et al. (03 CV 9849) ("Burnett D.C.")

Thomas E. Burnett, et al. v. Al Baraka Inv. & Dev.
Corp., et al. (03 CV 5738) ("Burnett N.Y.")

Cantor Fitzgerald & Co., et al. v. Al Baraka Inv. & Dev.
Corp., et al. (04 CV 7065) ("Cantor Fitzgerald")

Euro Brokers, Inc., et al. v. Al Baraka Inv. & Dev.
Corp., et al. (04 CV 7279) ("Euro Brokers")

Federal Ins. Co., et al. v. Al Qaida, et al. (03 CV 6978)
("Federal Insurance")

New York Marine and General Ins. Co. v. Al Qaida, et
al. (04 CV 6105) ("N.Y. Marine")

Estate of John P. O'Neill, Sr. v. Al Baraka Inv. & Dev.
Corp., et al. (04 CV 1923) ("O'Neill")

World Trade Center Prop., LLC, et al. v. Al Baraka
Inv. & Dev. Corp., et al. (04 CV 7280) ("World Trade
Center Properties")

Continental Casualty Co., et al. v. Al Qaeda, et al.
(04 CV 5970) ("Continental Casualty")

**CONSENT MOTION AND STIPULATION AS TO EXTENSION OF TIME
TO RESPOND TO COMPLAINTS CONSOLIDATED UNDER MDL 1570**

WHEREAS, the Plaintiffs in all of the above-referenced cases consolidated under 03 MDL 1570, and Defendants DMI Administrative Services S.A. ("DMI S.A.") and Dar Al-Maal Al-Islami Trust ("DMI Trust"), have entered into a Consent Motion and Stipulation as to Service

of Process and Extension of Time (the "Global Stipulation #1") that was Ordered by the Court on July 26, 2005 (Docket No. 1068);

WHEREAS, the Plaintiffs and Defendants DMI S.A. and DMI Trust thereafter entered into a Consent Motion and Stipulation as to Supplemental Memoranda and Extension of Time ("Global Stipulation #2") that was ordered by the Court on October 10, 2005 (Docket No. 1445);

WHEREAS, Defendants DMI S.A. and DMI Trust have responded to all of Plaintiffs' Complaints according to the schedule set forth in Global Stipulations #1 and #2;

IT IS HEREBY STIPULATED AND AGREED, by, between, and among counsel to the respective parties, that the time provided for the Plaintiffs to file a consolidated opposition to the motions to dismiss submitted by DMI S.A. and DMI Trust shall be extended to and through December 19, 2005. DMI S.A. shall file reply papers in the *Cantor Fitzgerald* and *O'Neill* actions on January 20, 2006; in the *Burnett D.C.*, *Burnett N.Y.*, *World Trade Center Properties*, and *Euro Brokers* actions on January 27, 2006; and in the *Federal Insurance* and *N.Y. Marine* actions on February 3, 2006. DMI Trust shall file reply papers in the *N.Y. Marine*, *Continental Casualty*, and *Federal Insurance* actions on February 3, 2006; in the *Ashton*, *Cantor Fitzgerald*, and *O'Neill* actions on February 10, 2006; and in the *Burnett D.C.*, *Burnett N.Y.*, *World Trade Center Properties*, and *Euro Brokers* actions on February 17, 2006.

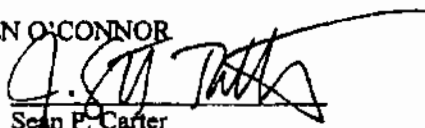
IT IS FURTHER HEREBY STIPULATED AND AGREED that this Stipulation is entered into without prejudice to the ability of DMI S.A. and DMI Trust to move the Court for an additional extension of time to respond upon or prior to the above referenced dates and/or to any objections that plaintiffs may make to such a motion.

IT IS FURTHER HEREBY STIPULATED AND AGREED that the parties hereto
reserve all rights and defenses not specifically addressed hereby.

Respectfully submitted.

COZEN O'CONNOR

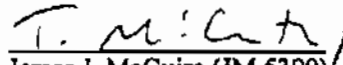
By:


Sean P. Carter
J. Scott Tarbutton
1900 Market Street
Philadelphia, PA 19103

*Attorneys for Federal Insurance Plaintiffs
and Liaison Counsel for Plaintiffs'
Executive Committee*

SHEPPARD MULLIN RICHTER & HAMPTON LLP

By:


James J. McGuire (JM 5390)
Timothy J. McCarthy (TM 2118)
30 Rockefeller Plaza, Suite 2400
New York, NY 10112

*Attorneys for Defendants
DMI Administrative Services S.A. and
Dar Al-Maal Al-Islami Trust*

SO ORDERED:


RICHARD CONWAY CASEY, U.S.D.J.

Dated: December 8, 2005

M